

San Diego County Water Authority Comments on the Salton Sea Ecosystem Restoration Programs's Preferred Alternative Process Working Group Meeting and Work Products

DWR expects this group to develop the "process" (i.e., prepare a list of key attributes, possibly with weighting factors) that the Advisory Committee would then use to rank the alternatives and advise the Resources Secretary, who will determine the Preferred Alternative (and an Environmentally Preferred Alternative, which may differ). Based on the preliminary work products developed by the group at its first meeting, the Authority provides the following comments. We will attend the October meeting and be able to answer questions these comments may raise.

Comments

Based on the group's initial input, a list of possibly relevant attributes and two matrices were prepared by the group's facilitator. One matrix utilized only DFG's legislative mandates (habitat restoration, air quality, water quality), a second matrix combined DFG's legislative mandates/ with a CEQA-based set of attributes, and the list comprised a set of relevant attributes that are often used in environmental documents.

A significant concern with any evaluation/rating process is that the evaluators/raters should have a reasonable, and preferably similar, familiarity with and understanding of the alternatives being rated. This presumes that the evaluators will have the time and capability to effectively review/evaluate the alternatives with regard to the attributes.

Given that 1) the PEIR has not been made available for review, 2) the alternatives incorporate complex engineering and biological assumptions/features, and 3) the raters have widely different backgrounds and technical capabilities, developing an effective evaluation/rating approach will be very difficult at best. That argues for a relatively simple evaluation process that focuses on fundamental issues, rather than an extensive set of issues.

A second and related concern is that the format of the currently identified attributes would be very difficult for the Advisory Committee to apply. Any evaluation process should be clear about what is to be evaluated and provide a scaling system. Simply listing a number of attributes (e.g., terrestrial species, aquatic species, effects on selenium, fugitive dust control, beneficial uses, recreational boating/fishing, hazardous conditions) does not provide the evaluator sufficiently clear guidance about what is being evaluated.

The attributes should reflect issues that are addressed in the PEIR's analysis of the alternatives (if not addressed in the PEIR, how could the process reasonably evaluate the attribute?), but not merely repeat the CEQA evaluation factors. This argues for specific, key attributes, for example (not a complete list):

- Supports invertebrate populations within the Salton Sea complex that could sustain historic numbers and diversity of avian species (and fish species as a second attribute?). The evaluation scaling could be based on the presumed

surface acres of viable/productive habitat that supports these species (but this requires the evaluator to recognize that saline shallow habitat and marine sea both could support this productivity, and at different acreages – shallow saline habitat is much more productive per acre).

- Supports historical diversity of avian species/wildlife within the Salton Sea habitats. The evaluation scaling could be based on the presumed availability of food resources (above) and acreage of any other required habitat in addition to the feeding areas.
- Maintains/reduces selenium levels in the Salton Sea that pose no significant threat to wildlife. The evaluation scaling could be based on what presumed selenium concentration will be input into the productive portion of the “Sea complex” and the risk of re-cycling in the productive areas (with less than 3ppm or whatever is the FWS/USGS “healthy aquatic level” being optimal).
- Maintains air quality emissions from the Salton Sea complex at levels equivalent to historical level. The evaluation scaling could be based on the presumed increase from the historical level of PM 10 and PM 25 materials.
- Accommodates recreational boating. The evaluation scaling could be based on the presumed surface acres of water that would be acceptable for boating (salinities similar to or less than seawater, ready access/launching, etc.).
- Water requirements conform with predicted inflows. The evaluation scaling could be based on whether the inflow requirement is within the presumed 80% mean annual inflow supply or not.
- Construction/restoration phases allow for maintaining Salton Sea productivity with no substantial intervals of severely limited productivity. The evaluation scaling could be based on relative ability of the alternative to minimize the time involved with protracted and major losses of key habitats and species.
- Implementation and operation (of the alternative) are realistic/adequately justified. The evaluation scaling could be based on whether the justification is sufficiently (or not) supported/defensible.

The group only briefly discussed whether the attributes should be weighted and no specific recommendation was made. Because the SSERP has specific legislative mandates, attributes that directly address these mandates should be considered for higher weighting than attributes that are not mandate-driven (or the mandate-driven attributes should at least be distinguished from those that have no specific mandate, so that their importance is not discounted).

The process must provide guidance regarding how the attributes are scaled/rated (none, low, medium, high; numerical scores 0-5; or even +/-o or yes/no) and none is provided in the matrices. Whatever scaling system is chosen will require that the attributes are amenable to at least some kind of relative rating, with sufficient information available to quantify differences between alternatives. Presumably the PEIR provides sufficient information on and assessment of each alternative to allow the evaluators/raters to make effective rating decisions. This raises the question of whether the evaluation process can be effectively created prior to the group's review of the PEIR.

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